

1 YOLANDA HUANG, SBN 104543
2 P.O. Box 5475
3 Berkeley, CA 94705
4 Tel: (510) 329-2140/ Fax: (510) 580-9410

5 DAN SIEGEL, SBN 56400
6 ANNE WEILLS, SBN 139845
7 SIEGEL & YEE
8 499 14th Street, Suite 300
9 Oakland, CA 94612
10 Tel: (510) 839-1200/ Fax: (510) 444-6698

11 Attorneys for Plaintiffs
12 STEVEN ANGELL, *et al.* and on
13 behalf of the proposed class

14 **UNITED STATES DISTRICT COURT**
15 **NORTHERN DISTRICT OF CALIFORNIA**

16 STEVEN ANGELL, MILES AVERY,
17 MOLLY BATCHELDER, SRI LOUISE
18 AKA LOUISE COLES, CICILY COOPER,
19 SHAREEF ELFIKI, THEODORE
20 HEXTOR, and LINDSAY WEBER,
21 individually and on behalf of others similarly
22 situated,

23 Plaintiffs,
24 vs.

25 CITY OF OAKLAND, COUNTY OF
26 ALAMEDA, HOWARD JORDAN,
27 JEFFREY ISRAEL, ERIC BRESHEARS,
28 RON YELDER, DARREN ALLISON,
STEVE TULL, EDWARD TRACEY,
ANTHONY RACHAL, SEAN WHENT,
GREGORY J. AHERN, BRETT KETELES,
CARLA KENNEDY, DAVID BRADY,
GREGORY L. MORGADO, KERRY
JACKSON, DOES 1-250,

Defendants.

Case No. C13-0190 NC

STIPULATION AND APPLICATION FOR
EXTENSION OF TIME FOR FILING OF
THE MOTION FOR FINAL APPROVAL
[Proposed] ORDER AS MODIFIED

Complaint Filed: January 14, 2013

1 The parties herein hereby stipulate and jointly apply to the Court for relief from existing
2 deadlines in the above-referenced matter as follows:

3 By order dated January 5, 2015 (Document 72), the Hon. Nathanael Cousins of this Court
4 ordered Plaintiffs to file their motion for final approval and any supplemental filings in support of
5 the requested incentive award and attorneys fees and costs, within 14 days of the date the class notice
6 is disseminated to the class members as provided in the settlement agreement. Per the settlement
7 agreement, for all class members who fail to respond within 45 days of the mailing of the notice,
8 plaintiffs will make every effort to contact those class members through direct contact,

9 The Court's order of January 5, 2015 set April 1, 2015 as the hearing date for the motion for
10 final approval.

11 The class notice was mailed to class members on January 15, 2015, and class members have
12 begun submitting completed claim forms. In light of the 45 day window contained within the
13 settlement agreement for the initial period for responses from class members, the parties believe that
14 it is in the best interest of justice and judicial economy, to wait until the 45 day period has passed in
15 order to assess the level of objections to the terms of the settlement, including the incentive awards
16 and attorneys fees, and respectfully request that plaintiffs be provided an extension of time to March
17 4, 2015 in which to file the motion for final approval and any supplemental filings in support of the
18 requested incentive award and attorneys fees and costs.

19 DATED: January 28, 2015

20 YOLANDA HUANG, ESQ.

21 By: /s/ Yolanda Huang

22 YOLANDA HUANG, ESQ.

23 Attorneys for Plaintiffs

24 DATED: January 28, 2015

25 SIEGEL & YEE

26 By: /s/ Dan Siegel

27 DAN SIEGEL, ESQ.

28 Attorneys for Plaintiffs

1 DATED: January 28, 2015

LOZANO SMITH

2
3
4 By: /s/ William E. Simmons
5 WILLIAM E. SIMMONS, ESQ.
6 Attorneys for Defendants
7 CITY OF OAKLAND, et al
8

9 DATED: January 28, 2015

BOORNAZIAN, JENSEN & GARTHE

10 A Professional Corporation
11
12
13

14 By: /s/ Gregory J. Rockwell
15 GREGORY J. ROCKWELL, ESQ.
16 Attorneys for Defendants
17 COUNTY OF ALAMEDA, et al.
18
19
20
21
22
23
24
25
26
27
28

ORDER

GOOD CAUSE appearing therefor, and the parties having so stipulated, the Court hereby GRANTS the parties' joint application for extension of time for filing the motion for final approval. February 13, 2015.
Last date for plaintiffs to file motion for class certification: ~~March 4, 2014~~

Dated: January 30, 2015

